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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

JOSEPH WALSH,

3:15-cv-01666 SI

PLAINTIFF,

v.

**DECLARATION OF JOHN J.
CHANDLER**

**BRYANT ENGE, CHARLIE HALES,
CITY OF PORTLAND,**

**(In Support of Defendants' Motion for
Summary Judgment)**

DEFENDANTS.

I, John J. Chandler, declare as follows:

1. I am employed by G4S Security International as the project manager for security services provided to the City of Portland for City Hall and the Portland Building. I have held this position since July 10, 2014.

2. My duties include oversight responsibility for the security contract for G4S Secure Solutions, Inc., who provide armed and unarmed uniformed security services to the City of Portland. As part of those duties I act on behalf of Bryant Enge, Bureau Director of Internal Business Services, who is granted authority and enforcement responsibilities of the "Code of Conduct for the City of Portland Properties" by the Mayor Charles Hales and Commissioners.

3. In my work experience, it is my observation that individuals visiting City offices, especially City Hall and City Council sessions, can be very disruptive and engage in inappropriate behavior which can result in exclusions and possibly arrest. The security of the buildings and its occupants is always the first priority for the security staff.

4. Security officers document the activities which take place in City Hall, the Portland Building and adjacent rights of way. Activities are not only recorded on video, but through written reports.

5. I directed all security officers to write incident reports documenting security concerns and disruptive and/or inappropriate behaviors. (See Report by Wayne Dykes, 01/09/2014, attached as Exhibit A.)

6. I also write incident reports.

7. I am familiar with Mr. Joe Walsh as he is a frequent demonstrator outside City Hall. He also regularly attends City Council meetings to observe and provide public testimony.

8. Mr. Walsh has a long history of being disruptive and combative while protesting outside City Hall, inside the building and while attending City Council meetings.

9. Attached to this Declaration as Exhibit A is a true and correct copy of the incident report written by former Sergeant Wayne Dykes documenting Mr. Walsh's behavior at the January 9, 2014 City Council meeting.

10. On May 7, 2014, I was contacted by Lisa Frisch on the 1st floor of City Hall. Ms. Frisch asked that I escort her from the building because of fear of retaliation from Joe Walsh.

11. Attached to this Declaration as Exhibit B is a true and correct copy of the incident report I wrote on May 7, 2014 documenting Ms. Frisch's concerns.

12. I was present at the May 13, 2015 City Council meeting and observed Mr. Walsh's behavior. Mayor Hales opened the session with his usual verbal admonishment regarding appropriate behavior expectations for Council meetings based on the Rules of Conduct for all City properties. I observed Mr. Walsh in attendance during Mayor Hales' admonishment on

decorum. Following Council's vote to proceed on Agenda Item 485 regarding demolishing the reservoirs, several individuals in attendance began to shout over the top of Mayor Hales. The audience employed very loud, boisterous and obnoxious chanting of the words "No" and "Boo." The chants grew louder and louder. Mayor Hales again admonished the crowd to stop. Since the audience continued to engage in its disruptive behavior, a recess was called. Joseph Walsh, Jessie Sponberg and Steven Entwhistle appeared to be directing the disruptive behaviors of the audience. They were the most vocal. Mr. Walsh rolled up a newspaper, resembling a megaphone, and repeatedly yelled "No" and "Boo" directly at Mayor Hales. The Mayor and Commissioners left the chamber. When the session reconvened, Dan Handelman and Constantin Severe attempted to present testimony on Agenda Item 486, but the crowd, lead by Walsh, Sponberg and Entwhistle repeated chanting "No," "Boo", and "No Demolition." Mr. Walsh laid down behind Mr. Severe while he testified and with his "megaphone" continued to yell "No" and "Boo".

13. Attached to this Declaration as Exhibit C is a true and correct copy of the incident report I wrote on May 13, 2015 documenting in detail Mr. Walsh's behavior on that date.

14. Mr. Walsh attended the City Council meeting on July 8, 2015. After exiting the chambers on that date, Mr. Walsh approached Josh Alpert (Mayor's Chief of Staff) who was standing in the Atrium area outside of City Council chambers. Walsh yelled at Alpert causing a disruption in City Hall.

15. Mr. Walsh's disruptive behavior during the July 8, 2015 City Council meeting resulted in him being excluded from City Hall for 60 days.

16. Attached to this Declaration as Exhibit D is a true and correct copy of the supplemental incident report I wrote documenting Mr. Walsh's behavior toward Mr. Alpert on July 9, 2015.

17. I personally served a Formal Exclusion letter on Mr. Walsh on July 15, 2015 at approximately 9:05 a.m. while he was in City Hall. I informed Mr. Walsh that he was formally

excluded from City Hall, the entire building and all the property surrounding the building for 60 days. Mr. Walsh took the exclusion letter from my hands and ripped the letter up into several small pieces and strewed the remnants of the letter onto the floor in front of City Hall Council Chambers. Mr. Walsh then raised his voice to a boisterous high pitch and made combative verbal statements regarding my actions. Mr. Walsh then left the building and immediately walked to the public sidewalk in front of City Hall and began yelling and pounding an unknown instrument on a metal surface for two hours.

18. On July 15, 2015 at approximately 10:10 a.m., in violation of his Exclusion from City Hall, Mr. Walsh entered City Hall through its main entrance on SW 4th Avenue and proceeded to the men's restroom on the 1st floor. I contacted Portland Police Officer Mike Bledsoe and informed him of Mr. Walsh's violation of the Exclusion. I entered the men's restroom accompanied by Officer Mike Bledsoe and advised Mr. Walsh that I was having him arrested for trespassing. Mr. Walsh became extremely boisterous and made accusations.


19. Mr. Walsh has been excluded from City Hall on two previous occasions and is fully aware of its limitations on his presence in the building.

20. Attached to this Declaration as Exhibit E is a true and correct copy of the incident report I wrote on July 15, 2015 documenting in detail my interaction with Mr. Walsh on that date.

21. I make this declaration in support of Defendants' Motion for Summary Judgment..

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: October 26, 2015.


 John J. Chandler

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing DECLARATION OF JOHN J. CHANDLER on:

Joseph F. Walsh
7348 SE Division Street
Portland, OR 97206
Plaintiff-Pro Se

30

on October 30, 2015, by causing a full, true and correct copy thereof, addressed to the last-known address (or fax number) of said attorney, to be sent by the following method(s):

- ☒ by **mail** in a sealed envelope, with postage paid, and deposited with the U.S. Postal Service in Portland, Oregon.
- ☐ by **hand delivery**.
- ☒ by **email** pursuant to LR 5-2(b).
- ☐ by **facsimile transmission**.
- ☐ by **email**.

Dan Simon

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